

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ARKANSAS TEACHER RETIREMENT
SYSTEM,

Plaintiff,

v.

ALLIANZ GLOBAL INVESTORS U.S. LLC,
et al.,

Defendants.

20 Civ. 5615 (KPF)

(caption continues on
following pages)

**STIPULATION AND ORDER REGARDING THE FILING OF PLAINTIFFS'
OMNIBUS BRIEF AND ACCOMPANYING SUBMISSIONS IN OPPOSITION
TO DEFENDANT ALLIANZ GLOBAL INVESTORS U.S. LLC'S MOTIONS
TO DISMISS**

RETIREMENT PROGRAM FOR EMPLOYEES OF THE
TOWN OF FAIRFIELD, *et al.*,

Plaintiffs,

20 Civ. 5817 (KPF)

v.

ALLIANZ GLOBAL INVESTORS U.S. LLC, and
ALLIANZ SE,

Defendants.

LEHIGH UNIVERSITY,

Plaintiff,

20 Civ. 7061 (KPF)

v.

ALLIANZ GLOBAL INVESTORS U.S. LLC,
et al.,

Defendants.

TEAMSTER MEMBERS RETIREMENT PLAN,
et al.,

Plaintiffs,

20 Civ. 7154 (KPF)

v.

ALLIANZ GLOBAL INVESTORS U.S. LLC,
et al.,

Defendants.

BLUE CROSS AND BLUE SHIELD ASSOCIATION
NATIONAL EMPLOYEE BENEFITS COMMITTEE,

Plaintiff,

20 Civ. 7606 (KPF)

v.

ALLIANZ GLOBAL INVESTORS U.S. LLC,
et al.,

Defendants.

METROPOLITAN TRANSPORTATION AUTHORITY
DEFINED BENEFIT PENSION PLAN MASTER TRUST,
et al.,

Plaintiffs,

20 Civ. 7842 (KPF)

v.

ALLIANZ GLOBAL INVESTORS U.S. LLC,
and ALLIANZ SE,

Defendants.

CHICAGO AREA I.B. OF T. PENSION PLAN & TRUST
and LOCAL 703 I.B. OF T., GROCERY AND FOOD
EMPLOYEES' PENSION PLAN & TRUST,

Plaintiffs,

20 Civ. 07952 (KPF)

v.

ALLIANZ GLOBAL INVESTORS U.S. LLC,
et al.,

Defendants.

THE EMPLOYEES' RETIREMENT SYSTEM OF THE CITY
OF MILWAUKEE,

Plaintiff,

20 Civ. 8642 (KPF)

v.

ALLIANZ GLOBAL INVESTORS U.S. LLC,
et al.,

Defendants.

CHICAGO & VICINITY LABORERS' DISTRICT COUNCIL PENSION FUND and CHICAGO & VICINITY LABORERS' DISTRICT COUNCIL HEALTH & WELFARE FUND, *et al.*,

Plaintiffs,

20 Civ. 9478 (KPF)

v.

ALLIANZ GLOBAL INVESTORS U.S. LLC,
et al.,

Defendants.

THE BOARDS OF TRUSTEES FOR THE CARPENTERS HEALTH AND SECURITY TRUST OF WESTERN WASHINGTON AND FOR THE GROUP INVESTMENT TRUST OF THE CARPENTERS INDIVIDUAL ACCOUNT PENSION TRUST OF WESTERN WASHINGTON AND CARPENTERS RETIREMENT TRUST OF WESTERN WASHINGTON,

Plaintiffs,

20 Civ. 9479 (KPF)

v.

ALLIANZ GLOBAL INVESTORS U.S. LLC,
et al.,

Defendants.

PAUL SCHAEFER, ROBERT O'TOOLE, MARC PARKER,
BRIAN JORDAN, MARK JACOBS, AND WILLIAM R.
SEEHAFER, as trustees of the United Food & Commercial
Workers Unions & Employers Midwest Pension Fund, on
behalf of the Plan,

Plaintiffs,

20 Civ. 9587 (KPF)

v.

ALLIANZ GLOBAL INVESTORS U.S. LLC,
et al.,

Defendants.

BOARD OF TRUSTEES OF THE INTERNATIONAL
BROTHERHOOD OF ELECTRICAL WORKERS, LOCAL
NO. 38 PENSION FUND PENSION PLAN,

Plaintiff,

20 Civ. 10028 (KPF)

v.

ALLIANZ GLOBAL INVESTORS U.S. LLC, and
ALLIANZ SE,

Defendants.

Defendant Allianz Global Investors U.S. LLC and plaintiffs (“Plaintiffs”) in the above-captioned actions (“Related Actions”) have agreed to the terms of this Stipulation and [Proposed] Order Regarding The Filing of Plaintiffs’ Omnibus Brief and Accompanying Submissions in Opposition to Defendant’s Allianz Global Investors U.S. LLC’s Motions to Dismiss (“Stipulation”) to govern Plaintiffs’ filing of a joint omnibus opposition brief and joint accompanying submissions (“Plaintiffs’ Joint Opposition Papers”) in each of the Related Actions.

WHEREAS, the Civil Case Management Plan #1 (“CMP”), entered by the Court in each of the Related Actions on December 7, 2020 provided for omnibus briefing of defendant Allianz Global Investors U.S. LLC’s (“Defendant”) motions to dismiss in the above-captioned Related Actions;

WHEREAS, pursuant to the CMP, Defendant filed its Omnibus Memorandum of Law In Support of Defendant Allianz Global Investors U.S. LLC’s Motions to Dismiss and accompanying submissions in the Related Actions on February 25, 2021; and

WHEREAS, pursuant to the CMP, Plaintiffs will file their Joint Opposition Papers on April 26, 2021,

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and among the Parties, through their undersigned counsel, as follows:¹

1. Plaintiffs’ Joint Opposition Papers will be filed once in the case captioned *Arkansas Teacher Retirement System v. Allianz Global Investors U.S. LLC*, No. 20 Civ. 5615 (KPF), and for the convenience of the Court and the Parties and by operation of this Stipulation, Plaintiffs’ Joint Opposition Papers shall be deemed filed in each of the other Related Actions.

¹ All electronic signatures (“/s/”) are signed with consent of counsel pursuant to Rule 8.5 of this Court’s Electronic Case Filing Rules & Instructions, as of February 1, 2021.

/s/ James Harrod

Hannah Ross
Avi Josefson
James Harrod
Michael Blatchley
BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP
1251 Avenue of the Americas
New York, NY 10020
Telephone: (212) 554-1400
Facsimile: (212) 554-1444

Co-Counsel for Plaintiff Arkansas Teacher Retirement System

Counsel for Plaintiff Employes' Retirement System of the City of Milwaukee; Plaintiffs Chicago & Vicinity Laborers' District Council Pension Fund and the Chicago & Vicinity Laborers' District Council Health & Welfare Fund, and Catherine Wenskus, Administrator; Plaintiffs The Boards of Trustees for the Carpenters Health and Security Trust of Western Washington and for the Group Investment Trust of the Carpenters Individual Account Pension Trust of Western Washington and Carpenters Retirement Trust of Western Washington

/s/ Fredric S. Fox

Fredric S. Fox
Donald R. Hall
KAPLAN FOX & KILSHEIMER LLP
850 Third Avenue, 14th Floor
New York, NY 10022
Telephone: (212) 687-1980
Facsimile: (212) 687-7714

Co-Counsel for Plaintiff Arkansas Teacher Retirement System

Co-Counsel for Plaintiffs Chicago Area I.B of T. Pension Plan & Trust and Local 703 I.B. of T., Grocery and Food Employees' Pension Plan & Trust

/s/ Robert J. Giuffra, Jr.

Robert J. Giuffra, Jr.
Stephanie G. Wheeler
Kathleen Suzanne McArthur
Ann-Elizabeth Ostrager
Jacob M. Croke
Hilary M. Williams
SULLIVAN & CROMWELL LLP
125 Broad Street
New York, New York 10004-2468
Telephone: (212) 558-4000
Facsimile: (212) 558-3588

Counsel for Defendant Allianz Global Investors U.S. LLC

/s/ Robert A. Skinner

Robert A. Skinner
Amy D. Roy
Mary Elizabeth Brust
Cole A. Goodman
ROPES & GRAY LLP
Prudential Tower
800 Boylston
Boston, MA 02199
Telephone: (617) 951-7000
Facsimile: (617) 951-7050

Co-Counsel for Defendant Allianz Global Investors U.S. LLC

/s/ Javier Bleichmar

Javier Bleichmar
George N. Bauer
BLEICHMAR FONTI & AULD LLP
7 Times Square, 27th Floor
New York, New York 10036
Telephone: (212) 789-1340
Facsimile: (212) 205-3960

Counsel for Plaintiff Board of Trustees of the International Brotherhood of Electrical Workers, Local No. 38 Pension Fund Pension Plan

/s/ David S. Golub

David S. Golub
Steven L. Bloch
Ian W. Sloss
SILVER GOLUB & TEITELL LLP
184 Atlantic Street
Stamford, CT 06901
Telephone: (203) 325-4491
Facsimile: (203) 325-3769

Counsel for Plaintiffs Retirement Program for Employees of the Town of Fairfield and Retirement Program for Fairfield Police and Firemen's Retirement System and the Board of Trustees of the New England Health Care Employees Pension Fund and the New England Health Care Employees Pension Fund

/s/ Jonathan L. Hochman

Jonathan L. Hochman
Matthew A. Katz
Jenny C. Gu
SCHINDLER COHEN & HOCHMAN LLP
100 Wall Street, 15th Floor
New York, NY 10005
Telephone: (212) 277-6300
Facsimile: (212) 277-6333

Counsel for Plaintiff Lehigh University

/s/ Scott F. Hessell

Scott F. Hessell
John Bjork
Ashima Talwar
SPERLING & SLATER, P.C.
55 West Monroe Street, Suite 3200
Chicago, Illinois 60603
Telephone: (312) 641-3200

Co-Counsel for Plaintiffs Chicago Area I.B. of T. Pension Plan & Trust and Local 703 I.B. of T., Grocery and Food Employees' Pension Plan & Trust

Co-Counsel for Plaintiffs Metropolitan Transportation Authority Defined Benefit Pension Plan Master Trust, Manhattan and Bronx Surface Transit Operating Authority Pension Plan, Metropolitan Transportation Authority Other Postemployment Benefit Plan

/s/ Regina Calcaterra

Regina Calcaterra
Justin Teres
CALCATERRA POLLACK LLP
1140 Avenue of the Americas, 9th Floor
New York, New York 10036
Telephone: (212) 899-1760

Co-Counsel for Plaintiffs Metropolitan Transportation Authority Defined Benefit Pension Plan Master Trust, Manhattan and Bronx Surface Transit Operating Authority Pension Plan, Metropolitan Transportation Authority Other Postemployment Benefit Plan

/s/ Daniel Z. Goldman

Daniel Z. Goldman
PETRILLO KLEIN & BOXER LLP
655 Third Avenue, 22nd Floor
New York, NY 10017
Telephone: (212) 370-0330

/s/ Sean W. Gallagher

Sean W. Gallagher
Adam L. Hoeflich
Mark S. Ouweleen
Abby M. Mollen
Nicolas L. Martinez
BARTLIT BECK LLP
54 West Hubbard Street, Suite 300
Chicago, IL 60654
Telephone: (312) 494-4400

Counsel for Plaintiffs Blue Cross and Blue Shield Association National Employee Benefits Committee

/s/ Kenneth A. Wexler

Kenneth A. Wexler
Mark J. Tamblyn
WEXLER WALLACE LLP
55 West Monroe Street, Suite 3300
Chicago, Illinois 60603
Telephone: (312) 346-2222

/s/ Anthony F. Shelley

Anthony F. Shelley
MILLER & CHEVALIER CHARTERED
900 Sixteenth Street N.W.
Black Lives Matter Plaza
Washington, DC 20006
Telephone: (202) 626-5924

/s/ Justin S. Brooks

Justin S. Brooks
Elizabeth H. Shofner
Reuben A. Guttman
GUTTMAN, BUSCHNER & BROOKS
PLLC
119 Coulter Ave., Suite 211
Ardmore, Pennsylvania 19003
Telephone: (610) 547-9556

*Co-Counsel for Plaintiff Blue Cross and Blue
Shield Association National Employee
Benefits Committee*

/s/ William C. Fredericks

William C. Fredericks
Donald A. Broggi
Zachary M. Vaughan
The Helmsley Building
230 Park Avenue, 17th Floor
New York, NY 10169
Telephone: (212) 223-6444

/s/ Jonathan D. Karmel

Jonathan D. Karmel
KARMEL LAW FIRM
221 N. La Salle Street, Suite 1550
Chicago, IL 60601
Telephone: (800) 459-6264

*Counsel for Plaintiffs Teamster Members
Retirement Plan f/k/a GCIU Inter-Local
Pension Plan, Board of Trustees of Teamster
Members Retirement Plan, Bricklayers and
Masons' Local Union No. 5, Ohio Pension
Fund, Board of Trustees of Bricklayers and
Masons' Local Union No. 5, Ohio Pension
Fund, and Rasmani Bhattacharya and Claude
Pumilia*

*Co-Counsel for Plaintiffs Paul Schaefer,
Robert O'Toole, Marc Parker, Brian Jordan,
Mark Jacobs, and William R. Seehafer, as
trustees of the United Food & Commercial
Workers Unions & Employers Midwest
Pension Fund, on behalf of the Plan*

IT IS SO ORDERED at New York, New York on this 23 day of April, 2021.

SO ORDERED:



Katherine Polk Failla
United States District Judge